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8 Attorneys for Plaintiff  
9 JOSEPH SARUBY

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 JOSEPH SARUBY	)	Case No.: 2:17-cv-00150-CWH
13 Plaintiff,	)	
14 v.	)	UNOPPOSED MOTION TO EXTEND
15 NANCY A. BERRYHILL, Acting	)	TIME
16 Commissioner of Social Security.	)	
17 Defendant.	)	
	)	

18  
19 Plaintiff Joseph Saruby and Defendant Nancy A. Berryhill, Acting  
20 Commissioner of Social Security (“Defendant”), through their undersigned counsel  
21 of record, hereby stipulate, subject to the approval of the Court, to modify the time  
22 for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to January 30,  
23 2018; and that Defendant shall have 30 days or until March 1, 2018, to file her  
24 opposition, if any is forthcoming. Any reply by plaintiff will be due March 21,  
25 2018.

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1 Counsel requires a final extension in order to properly present the issues in  
2 the administrative record and as a result of the press of the Holiday Season and the  
3 fact that Counsel, which this matter is assigned to, is a widower with two children  
4 ages ten and eight who required care. Counsel sincerely apologizes to the court for  
5 any inconvenience this may have had upon it or its staff.

6  
7 DATE: January 16, 2018

Respectfully submitted,

8 ROHLFING & KALAGIAN, LLP

9 /s/ *Marc V. Kalagian*

10 BY: \_\_\_\_\_

Marc V. Kalagian

11 Attorney for plaintiff Mr. Joseph Saruby, Jr.

12  
13 DATE: January 16, 2018

STEVEN W. MYHRE

14 Acting United States Attorney

15 /s/ *Sharon Lahey*

16 BY: \_\_\_\_\_

17 Sharon Lahey

18 Special Assistant United States Attorney

Attorneys for defendant Nancy A. Berryhill

19 |\*authorized by e-mail|

20  
21  
22  
23 DATED: January 19, 2018

24 IT IS SO ORDERED: \_\_\_\_\_

25 UNITED STATES MAGISTRATE JUDGE  
26

1                                   **CERTIFICATE OF SERVICE**  
2                                   **FOR CASE NUMBER 2:17-CV-00150-CWH**

3                   I hereby certify that I electronically filed the foregoing with the Clerk of the  
4 Court for this court by using the CM/ECF system on January 17, 2018.

5                   I certify that all participants in the case are registered CM/ECF users and  
6 that service will be accomplished by the CM/ECF system.

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8                                   */s/ Marc V. Kalagian*

9                                   \_\_\_\_\_  
10                                  Marc V. Kalagian  
11                                  Attorneys for Plaintiff  
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